

N00207.AR.003516
NAS JACKSONVILLE
5090.3a

LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT PROPOSED
PLAN FOR OPERABLE UNIT 2 POTENTIAL SOURCES OF CONTAMINATION 2, 41 AND 43
NAS JACKSONVILLE FL
3/8/1994
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles
Governor

10 MAR 1994
06

Florida Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

~~038-1531~~
0108-7559
Virginia B. Wetherell
Secretary

March 8, 1994

Mr. Joel Murphy
Code 1853
SOUTHNAVFACENGCOM
2155 Egale Drive
P.O. Box 190010
North Charleston, South Carolina 29419-9010

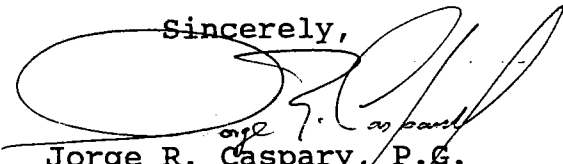
Dear Mr. Murphy;

The Department has received and reviewed the **Draft Proposed Plan for Operable Unit 2 (OU-2) Potential Sources of Contamination 2, 41, and 43** for NAS Jacksonville. Enclosed are comments on the referenced document.

The Department reminds the Navy that in accordance with the Federal Facilities Agreement (FFA) and the 1994 Site Management Plan, the Draft Remedial Investigation Report (RI) for this Operable Unit must still be submitted by the Navy at a later date. Upon the Finalization of the Proposed Plan, the Navy may initiate the public comment period for the preferred alternative at OU-2.

If I can be of any further assistance with this matter, please contact me at 904/488-0190.

Sincerely,



Jorge R. Caspary, P.E.
Remedial Project Manager
Base Cleanup Team

Enclosure

cc: James Hudson, EPA-Atlanta
Kevin Gartland, NAS Jacksonville
Peggy Layne, ABB-Tallahassee
Peter Redfern, ABB-Jacksonville

Memorandum

Florida Department of
Environmental Protection

TO: Eric S. Nuzie, Federal Facilities Coordinator
Bureau of Waste Cleanup

THROUGH: Dr. James J. Crane, PG Administrator
Technical Review Section *JJC*

FROM: Jorge R. Caspary, Remedial Project Manager *JRC*
Technical Review Section

DATE: March 1, 1994

SUBJECT: Review of Draft Proposed Plan for Interim Remedial
Action at OU-2. PSCs 2, 41, and 43.

I have reviewed the subject document and submit these comments
for the Navy's consideration.

GENERAL COMMENT

Please include in the proposed plan figures showing locations of
all the PSCs in relation to the installation.

SPECIFIC COMMENTS

Page 1.- Introduction.- The Navy indicates that " additional
studies of these areas, and at the other three PSCs at OU-2, will
be completed and cleanup actions will be initiated later if
necessary". The department recommends that a specific
or estimated date by which the RI effort will commence be made
available in this Document.

Page 2.- PSC Backgrounds.- PSC 43.- Please refer to the previous
comment.

Page 3.- Prior Investigation.- Please add & Associates to Fred C.
Hart and also add Inc. to Geraghty & Miller. A person unfamiliar
with previous investigations might conclude that previous to ABB
Environmental Services, only three persons investigated this PSC.

Page 4.- Human Health Assessment and Preliminary Remedial Goals.- Please note that FDEP has developed its own set of soil PRGs. These values have been obtained using formulas developed by FDEP's toxicologists. Also note that these values have been forwarded to the Navy and ABB's RPMS for NAS Jacksonville. The Department suggests the Navy review its database for these PSCs and compare it to Florida's PRGs for soil to see if any constituent has exceeded them. If any has, they should be listed in the Proposed Plan.

Page 7.- The Navy is encouraged to be more specific when referring to a "State ARAR".

Page 7.- An IRA in which petroleum-contaminated soil will be excavated is limited to 1500 cubic yards. (See Rule 17-770 F.A.C.). The Navy is encouraged to request an alternate procedure in order to increase the amount of petroleum-contaminated soil to be excavated.

Page 15.- Action Level.- For persons unfamiliar with the environmental arena, please be specific when referring to an "environmental medium".

